



NEW YORK

CALIFORNIA

GEORGIA

PENNSYLVANIA

Innessa M. Huot
ihuot@faruqilaw.com

May 3, 2024

VIA ECF

The Honorable Carol Bagley Amon
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Ruderman v. Law Office of Yuriy Prakhin, et al., No. 1:19-cv-02987-CBA-LB

Dear Judge Amon:

We represent Plaintiff in the above-referenced action and write, pursuant to Section 2(D) of Your Honor's Individual Motion Practices and Rules, to respectfully request an approximate one-month extension of the deadline for Plaintiff to file her application for attorneys' fees and costs, from May 13, 2024 to June 17, 2024.

On March 28, 2024, this Court issued an Order denying Defendants' post-trial motions and entering judgment against Defendants. As the prevailing party, Plaintiff intends to make an application to the Court for attorneys' fees and cost. Plaintiff previously requested an extension of the deadline to file her application because Plaintiff's counsel needed additional time to obtain the archived time records for the case. Indeed, work on this case started in December 2018 and the lawsuit was filed in early 2019. Since that time, Plaintiff's counsel switched the timekeeping program they utilized to maintain their billing records. Additional time was needed to retrieve the portion of the time records that were entered using the previous timekeeping program. Per this Court's April 1, 2024 Order, the current deadline for Plaintiff's application is May 13, 2024.

However, Plaintiff's counsel is still in the process of retrieving those time records and is working diligently to obtain the archived records. Plaintiff's counsel expects that the records will be available in the next few weeks. Once the records are retrieved, Plaintiff will use the records to prepare a detailed and comprehensive application for reasonable attorneys' fees and cost and will submit the referenced time records for the Court's review in support of her application.

As such, Plaintiff respectfully requests an extension – until June 17, 2024 – to file her application for attorneys' fees and costs for this case. This is Plaintiff's second request for an extension of this deadline. Defendants advised that they consent to Plaintiff's extension request.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'I. Huot', is written over a blue circular stamp.

Innessa M. Huot